

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE:	X	
	X	
ADVANCED SOLIDS CONTROL, LLC	X	CASE NO. 16-52748-RBK
	X	
DEBTOR	X	CHAPTER 11

**SECOND MOTION OF ADVANCED SOLIDS CONTROL, LLC TO EXTEND
DEADLINE TO FILE CHAPTER 11 PLAN OF REORGANIZATION**

**THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO
YOUR INTERESTS.**

**IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21)
DAYS FROM THE DATE OF SERVICE, THE RELIEF REQUESTED
HEREIN MAY BE GRANTED WITHOUT A HEARING BEING HELD.**

**A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE
HELD.**

TO THE HONORABLE RONALD B. KING, CHIEF JUDGE,
UNITED STATES BANKRUPTCY COURT:

Now comes, Advanced Solids Control, LLC, Debtor in Possession, and files this its Second Motion to Extend Deadline to File Chapter 11 Plan of Reorganization (hereinafter "Motion"), and in support thereof, would show the Court as follows:

1. On December 2, 2016, Advanced Solids Control, LLC (hereinafter called "Debtor") filed its voluntary Petition for Relief under Chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Western District of Texas, San Antonio Division.

2. The Debtor's Chapter 11 Plan of Reorganization bar date (exclusivity deadline) is May 31, 2017. (On March 28, 2017, the Debtor filed its Motion to Extend Deadline to File Chapter 11 Plan of Reorganization, and on April 21, 2017, the Order Granting Motion to Extend Deadline to File Chapter 11 Plan of Reorganization was entered.)

3. Debtor will not be able to file its Chapter 11 Plan of Reorganization and Disclosure Statement by May 31, 2017 because additional time is needed to coordinate the completion and filing of the Chapter 11 Plan of Reorganization and Disclosure Statement.

4. The Debtor and its counsel have been working diligently to prepare the necessary information which is essential to a Chapter 11 Plan of Reorganization and Disclosure Statement. The Plan and Disclosure Statement are in the process of being drafted and circulated to the Debtor for review and comment. More time is needed to complete and finalize the Plan terms prior to filing. The Debtor is having to spend substantial time reviewing its assets and determining the market value of the assets. The Debtor and its counsel need an additional thirty (30) days to complete and file the Chapter 11 Plan and Disclosure Statement. The goal of the Debtor is to file its Plan and Disclosure Statement as soon as possible, and the Debtor will continue with its best efforts in doing so.

5. The Debtor anticipates that it can fully and accurately complete and file its Chapter 11 Plan of Reorganization and Disclosure Statement on or before June 30, 2017.

6. Therefore, the Debtor is requesting that the Court extend the time period within which it has the exclusive right to file its Chapter 11 Plan of Reorganization and Disclosure Statement until June 30, 2017, and the deadline to obtain confirmation of the Debtor's Plan of Reorganization is extended until September 30, 2017.

7. The extension of exclusivity requested herein is proposed in good faith and reasonable under the circumstances.

8. Counsel for the Debtor attempted to contact James Rose at the U.S. Trustee's Office, regarding the relief requested herein; Mr. Rose was out of the office working and unable to discuss the relief requested herein.

9. Attached hereto is a copy of the Order which has been uploaded with this Motion.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully requests that the Court extend the Debtor's time to file its Chapter 11 Plan of Reorganization and Disclosure Statement, and for such other and further relief to which it may show itself entitled.

Dated: May 18, 2017.



WILLIAM R. DAVIS, JR.
State Bar No. 05565500
LANGLEY & BANACK, INC.
745 E. Mulberry, Suite 900
San Antonio, TX 78212
(210) 736-6600

Attorneys for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on May 18, 2017, a true and correct copy of the above and foregoing instrument was mailed, first class, postage prepaid to the attached notice list.


WILLIAM R. DAVIS, JR.

Advanced Solids Control, LLC
c/o Mr. Lynn Frazier
5655 Bear Lane, Suite 100
Corpus Christi, TX 78405

U.S. Trustee
P.O. Box 1539
San Antonio, TX 78295-1539

Eddy County Treasurer
101 W. Greene, Suite 117
Carlsbad, NM 88220

First National Bank of Beeville
1400 E. Houston St.
Beeville, TX 78102

Midland Central Appraisal District
P.O. Box 908002
Midland, TX 79708

Midland County
c/o Laura J. Monroe
P.O. Box 817
Lubbock, TX 79408

Nueces County
P.O. Box 2810
Corpus Christi, TX 78403

Darin Jerle Harding
P.O. Box 743
Grande Prairie Alberta T8V3R5

Sentrimax Centrifuges, Inc.
108 Sentry Drive
Mansfield, TX 76063

Gary Sweetman
226 Augusta Drive
Portland, TX 78374

Magnum Oil Tools Int'l, Ltd.
5655 Bear Lane, Suite 100
Corpus Christi, TX 78405

Crain, Caton & James
17th Fl., 1401 McKinney St.
Houston, TX 77010-4035

Stang Automation, Inc.
100 Pointe Marcelle Beaumont
Alberta T4X 0G2 Canada

Ber Mar Rewind, Ltd.
9609 109 Street
Grand Prairie AB T8V 4E3 Canada

Kirby-Smith Machinery, Inc.
P.O. Box 270360
Oklahoma City, OK 73137

Williams Scotsman, Inc.
P.O. Box 91975
Chicago, IL 60693-1975

Tucker Albin & Assoc., Inc.
1702 N. Collins Blvd., Suite 100
Richardson, TX 75080

Harvey Fuels, Inc.
P.O. Box 8026
Ruidoso, NM 88355

Forrest Tire, Inc.
P.O. Box 1778
Carlsbad, NM 88221-1778

A.G. Investments, Ltd.
740 Walt Whitman Rd.
Melville, NY 11747-9090

Pactec, Inc.
P.O. Box 8069
Clinton, LA 70722

ASK Environmental Equipment
20504 Enfield Ave. N
Forest Lake, MN 55025

Harvey Rodriguez
215 E. Elm St.
Loving, NM 88256

United Healthcare
Dept. CH 1051
Palatine, IL 60055-0151

DNOW, LP
P.O. Box 40985
Houston, TX 77240-0985

JB Electric, LLC
P.O. Box 171
Carlsbad, NM 88221

Big Dog - Rig Movers
7500 W. Hwy. 80
Midland, TX 79706

Robert L. Barrows
Warren, Drugan & Barrows, PC
800 Broadway
San Antonio, TX 78215

Diane W. Sanders
Linebarger Goggan Blair & Sampson
PO Box 17428
Austin, TX 78760

Ronald A. Simank
Schauer & Simank, PC
615 N. Upper Broadway, Suite 700
Corpus Christi, TX 78401

Lee Gordon
McCreary, Veselka, Bragg & Allen
P.O. Box 1269
Round Rock, TX 78680

Scott Duncan
Magnum Oil Tools International
5655 Bear Lane, Suite 100
Corpus Christi, TX 78405